

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:23-CR-00380-SRC
)	
SONNY SAGGAR, M.D.,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO REMAIN ON BOND UNDER PRETRIAL SUPERVISION
PENDING SENTENCING

Defendant Sonny Saggar, M.D., through Attorney William Marsh, respectfully requests that he, upon entering his plea of guilty, be permitted to remain on his existing bond under pretrial supervision pending sentencing. In support, Dr. Saggar states as follows:

1. On August 15, 2024, Dr. Saggar intends to plead guilty to one count of Conspiracy in violation of 18 U.S.C. § 371.
2. Because the offense to which Dr. Saggar intends to plead guilty does not fall within the mandatory detention requirement of 18 U.S.C. § 3143, the Court may permit him to remain on pretrial supervision pending sentencing if: (1) the U.S. Sentencing Guidelines do not recommend a term of imprisonment; *or*, (2) Dr. Saggar establishes by clear and convincing evidence that he is not likely to flee or pose a danger to the safety of any other person in the community. *See* 18 U.S.C. § 3143(a)(1); *see also* 18 U.S.C. § 3142(f)(1)(A)-(C).
3. Continued release is appropriate in this case because Dr. Saggar meets the § 3143(a)(1) standard. He has been on pretrial release since July 27, 2023, the same day he

surrendered his passport to the Court. (R. Doc. 21). The only known conduct violation was filed with the Court on October 13, 2023, which recommended no adverse action. (R. Doc. 50). Since that time, he has reportedly been in full compliance with the conditions of supervision. Moreover, Dr. Saggar—who does not have a single criminal conviction—has maintained full-time employment as a physician within the Eastern District of Missouri during the pendency of his case. Through the nature of his practice, Dr. Saggar has strong ties to the community. He also has extensive community ties through his volunteer work, which has included working in the Missionaries of Charity soup kitchen. In addition, Dr. Saggar volunteers for the St. Nicholas Catholic Church in St. Louis city working in the food pantry and providing free medical care for families in need every Monday morning.

3. Finally—and as further assurance that Dr. Saggar does not present a flight risk—he is currently in the middle of divorce proceedings, with court scheduled to commence by October, 2024 in St. Louis county. Dr. Saggar and his wife are now separated and share custody of their two younger children. In addition to caring for the kids, Dr. Saggar supports them—and his wife—financially.

For the foregoing reasons, Dr. Saggar respectfully requests that the Court grant his motion to remain on his existing bond under pretrial supervision pending sentencing.

Dated: August 5, 2024

Respectfully submitted,

/s/ William Marsh

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Attorney for Defendant Sonny Saggar, M.D.

CERTIFICATE OF SERVICE

I hereby certify on August 5, 2024, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Assistant United States Attorney.

/s/ William Marsh

William Marsh